IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

INTELLECTUAL VENTURES I LLC and INTELLECTUAL VENTURES II LLC Plaintiffs, v. ERIE INDEMNITY COMPANY; ERIE INSURANCE EXCHANGE; ERIE INSURANCE PROPERTY & CASUALTY COMPANY; ERIE INSURANCE COMPANY; FLAGSHIP CITY INSURANCE COMPANY; and ERIE FAMILY LIFE INSURANCE COMPANY Defendants.	S S Civil Action No. 1:14-CV-00220 S LEAD CASE JURY TRIAL DEMANDED S S S S S S S S S S S S S S S S S S
INTELLECTUAL VENTURES I LLC and INTELLECTUAL VENTURES II LLC Plaintiffs, v. OLD REPUBLIC GENERAL INSURANCE GROUP, INC; OLD REPUBLIC INSURANCE COMPANY; OLD REPUBLIC TITLE INSURANCE GROUP, INC; and OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY Defendants.	\$ \$ \$ \$ \$ \$ \$ \$ Civil Action No. 2:14-CV-1130 \$ \$ JURY TRIAL DEMANDED \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$

INTELLECTUAL VENTURES I LLC	§	
and	§	
INTELLECTUAL VENTURES II LLC	§	
	§	Civil Action No. 2:14-CV-1131
Plaintiffs,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
HIGHMARK, INC.;	§	
HM INSURANCE GROUP, INC.;	§	
HM LIFE INSURANCE COMPANY;	§	
HIGHMARK CASUALTY	§	
INSURANCE COMPANY;	§	
HM CASUALTY INSURANCE	§	
COMPANY;	§	
	§	
Defendants.	§	
	§	
	§	

THE INTELLECTUAL VENTURES PLAINTIFFS'
MOTION FOR LEAVE TO FILE RESPONSE TO
NOTICES OF SUPPLEMENTAL AUTHORITY

Intellectual Ventures submits this motion for leave to respond to two notices of supplemental authority filed by the Old Republic Defendants. On June 12, the Old Republic Defendants file a notice regarding the *OIP Technologies, Inc. v. Amazon.com, Inc.*, No. 2012-1696 (Fed. Cir. June 11, 2015) decision. Docket No. 103. That notice included three-and-a-half pages of argument. On June 23, the Old Republic Defendants filed another notice regarding the *Internet Patents Corp. v. Active Networks, Inc.*, No. 2014-1048 (Fed. Cir. June 23, 2015) decision. Docket No. 104. That notice contained nearly seven pages of argument. In total, the Defendants' notices contain ten pages of additional argument regarding the motions to dismiss.

Intellectual Ventures believes that these "notices" are improper attempts by the Defendants to get the last word on their motions and, accordingly, requests that the Court disregard them. Should the Court consider Old Republic's notices, Intellectual Ventures respectfully requests that the Court grant Intellectual Ventures leave to file the attached three-page response to the Defendants' notices. The response that Intellectual Ventures seeks to file is attached at Exhibit A to this Motion.

Counsel for Intellectual Ventures met-and-conferred with counsel for Old Republic, and counsel for Old Republic indicated that it opposes the relief requested by this motion.

A proposed order is attached.

Respectfully submitted,

/s/Robert L. Wagner

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COUNSEL FOR PLAINTIFFS INTELLECTUAL VENTURES I LLC AND INTELLECTUAL VENTURES II LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5.5 and served via the Court's electronic filing system on all counsel who have consented to electronic service on June 29, 2015.

/s/Robert L.	Wagner	